

# STATE OF CONNECTICUT

## DEPARTMENT OF PUBLIC HEALTH

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Office of Public Health Preparedness and Response

OPHPR-2023-003

Date: March 9, 2022

To: Directors of Health, Acting Directors of Health

From: Francesca Provenzano, MPH, RS  
Chief, Office of Public Health Preparedness and Response (OPHPR)

RE: FAQs from CT Department of Energy and Environmental Protection (DEEP) on  
Rapid Antigen Test Kit Disposal Guidance

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The Connecticut Department of Public Health (CT DPH) Office of Public Health Preparedness and Response (OPHPR) had previously circulated a memorandum to state and local partners regarding guidance on the appropriate disposal of rapid antigen home test kits. Memorandum # [OPHPR-2022-011](#), and its attachment about disposal guidance remains valid. The OPHPR memorandum contains links to the FDA website for determining test kits extensions, and an attachment that lists out a variety of antigen test kits and their waste classification.

Many of you have successfully distributed rapid antigen test kits to individuals and businesses in your communities. We also recognize that you may be receiving inquiries from private businesses, and municipal offices that have an existing supply of test kits over concerns for their distribution or disposal. Recognizing a potential increase in calls, DEEP recently developed a 'Frequently Asked Questions' document pertaining to waste disposal of test kits; it contains useful information that addresses many questions your constituents may have. Please feel free to also distribute this information to community partners.

Should you receive any unusual questions, feel free to direct them to the [PHAD.dph@ct.gov](mailto:PHAD.dph@ct.gov) email that OPHPR staff monitor. Thank you.

att

c: L. Morrissey, Deputy Commissioner  
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## FAQs on Disposal of Rapid Antigen Test Kits

### from Connecticut Department of Energy and Environmental Protection

- Are the test kits biomedical waste? *Unused* COVID rapid test kits would not be subject to regulation as biomedical waste, since they do not contain a sharp and have not been contaminated with human blood or bodily fluids that might be infectious.

However, certain components of *used* rapid test kits would be biomedical waste – in particular, the used nasal swab. Non-residential users of these test kits can get more information about the management of biomedical waste on the [DEEP Biomedical Waste Web Page](#). Information for residential users is provided in a separate bullet below.

- Are the test kits hazardous waste? Refer to the list of COVID rapid test kits put together in response to an inquiry from a number of CT state agencies that had bought large numbers of these test kits, some of which had expired. Research into these test kits did not find that any of them were hazardous waste.
- How are the test kits regulated, then? Although unused rapid test kits are not regulated as biomedical or hazardous waste, all of them contain a vial that contains a chemical extraction fluid, so non-residential generators should dispose of them as [Connecticut-Regulated Waste](#) (CR04). This would include the entire test kit, unless the generator wants to take the time to go through all of the test kits to remove the extraction vials and dispose of the remainder of the kit as regular solid waste. This would save some disposal cost, but might not be worth the cost of labor to separate out the vials. There's nothing else in the kits that is restricted from disposal in the regular trash. It's just the vials that are a concern.
- How should unused test kits be disposed of? As Connecticut-Regulated Wastes, the test kits must be hauled away for disposal by a [DEEP-permitted hazardous/CT-Regulated waste hauler](#). Some (but not all) [DEEP-permitted biomedical waste haulers](#) are also permitted to haul Connecticut-Regulated Waste, so if the generator has a biomedical waste hauler, that hauler might be able to legally take it away. If not, they will have to find another hauler to take it.

Colleges and universities and businesses often already have licensed haulers in place and can utilize an existing hauler to dispose of unwanted or unusable test kits.

If the generator is a town department such as a fire or police department, a school, or a health department, another town department may already have a contract with a properly-licensed hauler, so they should check around with other town departments to see if any of them already have a hauler.

- Disposal of test kits by residential generators. *Unused* test kits being disposed of by residential generators should be managed as described on the [DEEP's household hazardous waste web page](#).

Components of *used* test kits being disposed of by residential generators that are contaminated with blood or bodily fluids should be managed in accordance with item #5 in [DEEP's Biomedical Waste FAQs web page](#).